

New Opportunities for Collaboration Between Title I and Homeless Education Programs



2014 Special Populations Conference

Giving something extra puts students on top!

Office of Field Services

Presenters:

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Office of Field Services



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OFS MISSION

Accelerate student achievement
through school improvement
by working as partners to
maximize the allowable use
of supplementary resources.

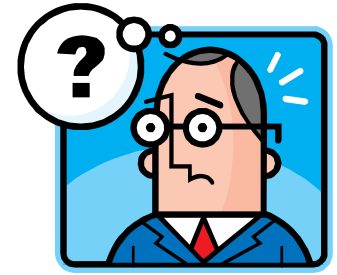


TODAY'S AGENDA



- Welcome & Introductions
- Purpose of the session
- MV Homeless Education Citations on Title I
- Title I Citations on Homeless Students
- The 2014 Guidance & Clarifications from USED
- Impact of New Guidance on our MV work
- Strategies for Improved Collaboration





**Do you know
the name of
your district's
Title I Administrator?**



Purpose of Today's Session

- Acquaint participants with MV requirements for public school districts and MV Liaisons
- Acquaint participants with Title I requirements for public school Homeless Education Programs
- Share the 2014 Consolidated Appropriations Act sections impacting these two programs
- Share the USED and MDE Guidance resulting from this 2014 legislation
- Offer practical strategies for Liaisons and other district staff in implementation



McKinney-Vento Homeless Education Programs

**Elementary and Secondary Education Act
(ESEA)
Title X, Part C**



McKinney-Vento Homeless Assistance Act

- Reauthorized in 2002 as Title X, Part C of NCLB (ESEA)
- Main themes:
 - School stability
 - School access
 - Support for academic success
 - Child-centered focus
 - Decision making in the best interest of child



Who is Considered HOMELESS?

Children who lack a fixed, regular, and adequate nighttime residence:

- Sharing the housing of others due to loss of housing, economic hardship, or similar reason
- Living in motels, hotels, RV/trailer parks, campgrounds, etc. due to lack of adequate alternative accommodations
- Living in emergency, domestic violence, youth or transitional shelters
- Temporary foster care placement or awaiting foster care placement - *MDE Guidance**

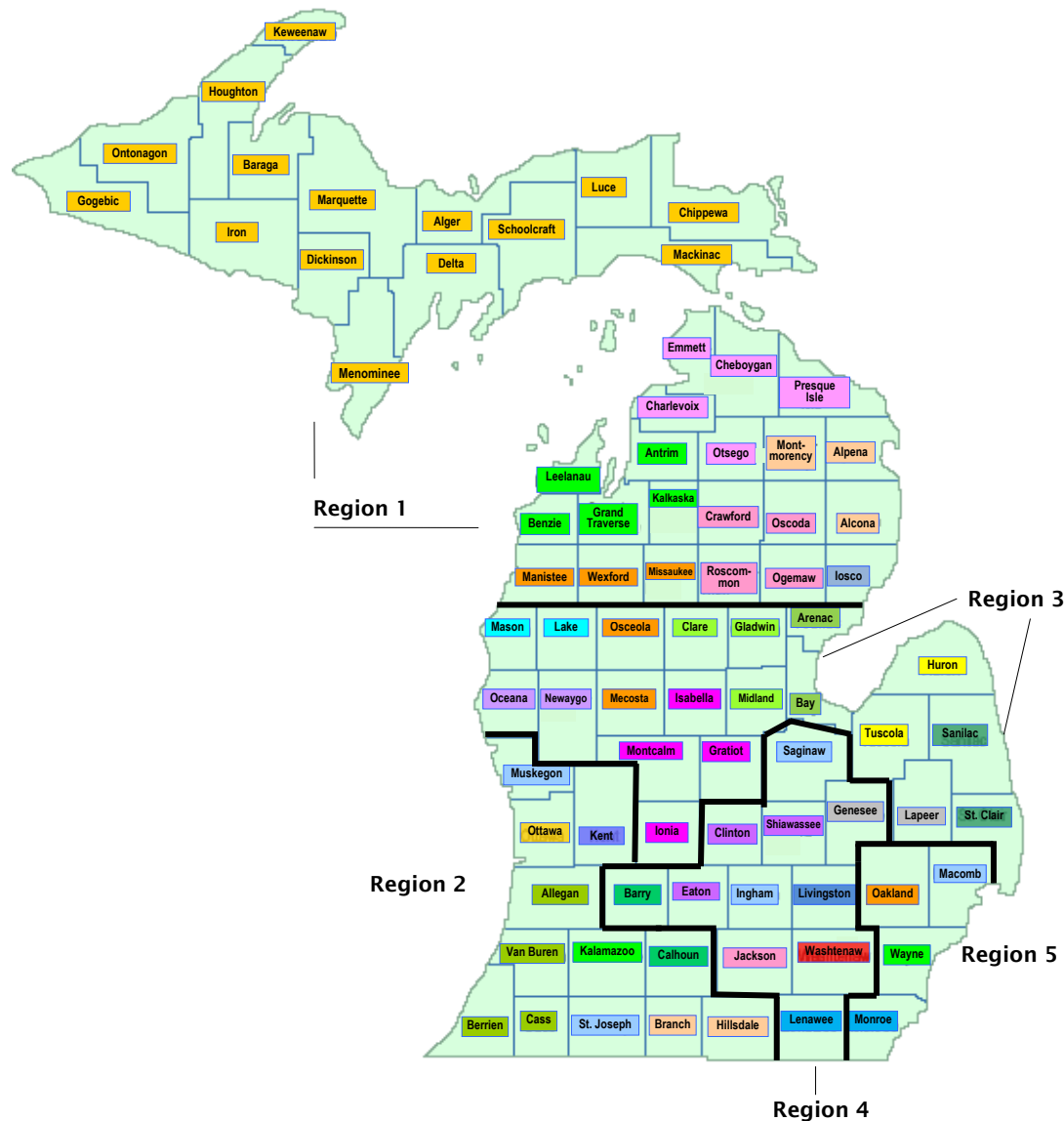


Who is Considered HOMELESS?

Children who lack a fixed, regular, and adequate nighttime residence:

- Living in a public or private place not designed for humans to live or sleep
- Living in cars, parks, abandoned buildings, bus or train stations, under bridges, etc.
- Migratory children living in above circumstances
- Runaway or “throw-away” youth not with parent/guardian





McKinney-Vento Grant Consortia 2015 - 2017

- ❖ ALL MI COUNTIES represented in 33 Homeless Education Grant Consortia
- ❖ Over 96% of MI LEAs participating in M-V Grant Consortia
- ❖ Interactive map with grant contacts: www.michigan.gov/homeless



Rights of Homeless Children/Youth

- Right to immediate enrollment, even when documentation and records are not present
- Right to remain in the school of origin, if in the student's best interest
- Right to receive transportation to the school of origin
- Right to receive support for academic success



DISTRICT RESPONSIBILITIES:

ALL LEAS MUST SERVE HOMELESS STUDENTS

To comply with the McKinney-Vento Act, ALL districts must have a basic Homeless Education Program in place.

- Whether or not any homeless students have been identified
- Whether or not LEA receives M-V grant funds
- Basic program requirements are detailed in MV District Homeless Education Self Assessment protocol, completed once per 3-yr. grant cycle



DISTRICT RESPONSIBILITIES:

ALL LEAS MUST SERVE HOMELESS STUDENTS

To comply with the McKinney-Vento Act, ALL districts must:

- **Develop, review, and revise district policies** to remove barriers to the enrollment and retention of children/youth in homeless situations
- **Designate a Homeless Education Liaison** to identify and serve homeless children and youth and their families in the LEA attendance area



MV Citations on Title I

§ 722 (g) (4) COMPARABLE SERVICES -

Each homeless child or youth to be assisted under this subtitle shall be provided services comparable to services offered to other students in the school selected under paragraph (3), including the following:

(B) Educational services for which the child or youth meets the eligibility criteria, such as services provided **under Title I of the Elementary and Secondary Education Act of 1965** or similar State or local programs, educational programs for children with disabilities, and educational programs for students with limited English proficiency.



MV Citations on Title I

§ 723 (d) AUTHORIZED ACTIVITIES -

A local educational agency may use funds awarded under this section for activities that carry out the purpose of this subtitle, including the following:

(2) The provision of **expedited evaluations of the strengths and needs of homeless children and youths, including needs and eligibility for programs and services (such as educational programs for gifted and talented students, children with disabilities, and students with limited English proficiency, services provided under Title I of the Elementary and Secondary Education Act of 1965** or similar State or local programs, programs in vocational and technical education, and school nutrition programs).



MV Citations on Title I USED Guidance

H-3. May funds under Part A of Title I or Part A of Title V of the ESEA be used to transport homeless students to and from the school of origin?

In general, LEAs may not use funds under Title I, Part A or Title V, Part A to transport homeless students to or from their school of origin. Transportation services to the school of origin are mandated under the McKinney-Vento Act statute. The no-supplanting provisions in Title I and Title V prohibit those funds from being used to support activities that the LEA would otherwise be required to provide.

**** THIS SECTION WAS REVISED UNDER THE
2014 CONSOLIDATED APPROPRIATIONS ACT***



MV Citations on Title I USED Guidance

M. Coordination with Title I, Part A of the ESEA

M-1. Are homeless children and youth eligible to receive Title I, Part A services?

Yes. Homeless children and youth are automatically eligible for services under Title I, Part A of the ESEA, whether or not they live in a Title I school attendance area or meet the academic standards required of other children for eligibility.

Homeless children and youth may receive Title I educational or support services from schoolwide and targeted-assistance school programs.

A State must include in its State Title I plan a description of how the plan is coordinated with the McKinney-Vento Act.

(See Section 1111(a)(1) of the ESEA.)



MV Citations on Title I USED Guidance

M. Coordination with Title I, Part A of the ESEA

M-2. If a homeless child becomes permanently housed during a school year, is that child eligible to receive **Title I, Part A services** for the remainder of that school year?

M-3. Are homeless children and youth who attend non-Title I schools eligible to receive **Title I, Part A services**?

M-4. What types of services may an LEA provide to homeless students with **funds reserved under Section 1113(c)(3) of Title I**?

M-5. Does a State's academic assessment system need to include homeless students?

All answers are “YES,” with further detail on M-4 on Slide 34.



QUESTIONS SO FAR



Title I, Part A Programs

**Elementary and Secondary Education Act
(ESEA)
Title I, Part A**



Title I Citations on Homeless Students

TITLE I, PART A, §1111. STATE PLANS

(a) PLANS REQUIRED-

(1) IN GENERAL - For any State desiring to receive a grant under this part, the State educational agency shall submit to the Secretary a plan, developed by the State educational agency, in consultation with local educational agencies, teachers, principals, pupil services personnel, administrators (including administrators of programs described in other parts of this title), other staff, and parents, **that satisfies the requirements of this section and that is coordinated with other programs under this Act**, the Individuals with Disabilities Education Act, the Carl D. Perkins Vocational and Technical Education Act of 1998, the Head Start Act, the Adult Education and Family Literacy Act, **and the McKinney-Vento Homeless Assistance Act.**



Title I Citations on Homeless Students

§ 1112. LOCAL EDUCATIONAL AGENCY PLANS.

(a) PLANS REQUIRED-

(1) **SUBGRANTS-** A local educational agency may receive a subgrant under this part for any fiscal year only if such agency has on file with the State educational agency a plan, approved by the State educational agency, that is coordinated with other programs under this Act, the Individuals with Disabilities Education Act, the Carl D. Perkins Vocational and Technical Education Act of 1998, **the McKinney-Vento Homeless Assistance Act**, and other Acts, as appropriate.



Title I Citations on Homeless Students

§ 1112. LOCAL EDUCATIONAL AGENCY PLANS.

(b) PLAN PROVISIONS-

(1) IN GENERAL- In order to help low-achieving children meet challenging achievement academic standards, each local educational agency plan shall include —

(E) a description of **how the local educational agency will coordinate and integrate services provided under this part with other educational services** at the local educational agency or individual school level, such as —

(ii) services for children with limited English proficiency, children with disabilities, migratory children, neglected or delinquent youth, Indian children served under part A of title VII, **homeless children**, and immigrant children in order to increase program effectiveness, eliminate duplication, and reduce fragmentation of the instructional program;

(O) a description of the services the local educational agency will provide homeless children, including services provided with funds reserved under section 1113(c)(3)(A)



Title I Citations on Homeless Students

§ 1113. ELIGIBLE SCHOOL ATTENDANCE AREAS.

(c) ALLOCATIONS-

(3) RESERVATION- A local educational agency **shall reserve such funds as are necessary under this part to provide services comparable** to those provided to children in schools funded under this part to serve —

(A) homeless children who do not attend participating schools, including providing educationally related support services to children in shelters and other locations where children may live

§ 1115. TARGETED ASSISTANCE SCHOOLS.

(E) HOMELESS CHILDREN- A child who is homeless and attending any school served by the local educational agency is eligible for services under this part.



QUESTIONS SO FAR



2014 Consolidated Appropriations Act

§ H, Title III—Department of Education DEPARTMENT OF EDUCATION EDUCATION FOR THE DISADVANTAGED

That funds available under sections 1124, 1124A, 1125 and 1125A of the ESEA may be used to provide homeless children and youths with services not ordinarily provided to other students under those sections, including supporting the liaison designated pursuant to section 722(g)(1)(J)(ii) of the McKinney-Vento Homeless Assistance Act, and providing transportation pursuant to section 722(g)(1)(J)(iii) of such Act.



2014 Consolidated Appropriations Act

The Consolidated Appropriations Act of 2014 applies to all public schools, regardless of:

- Title I funding status
- Title I building status
- Number of homeless students identified
- MV grant consortium member status

To listen to details of the USED WEBINAR on the Act, click this link:
<http://www2.ed.gov/programs/titleiparta/legislation.html>
(Scroll down to first bullet under “Fiscal” section)



2014 Consolidated Appropriations Act

This new appropriations language applies to:

- Fiscal Year (FY) 2014 Title I funds
- Under section 421(b) of the General Education Provisions Act (GEPA), the appropriations language also applies to FY 2013 and 2013 Title I carryover funds.
- *NOTE: USED anticipates this will be renewed in the Continuing Resolution for 2015.*



2014 USED Guidance/Clarifications

- The US Department of Education (USED) issued Guidance on the 2014 Consolidated Appropriations Act, via “Dear Colleague” letters, on three dates:
 - March 21, 2014
 - May 22, 2014
 - July 22, 2014
- Guidance was focused on –
 - Clarifying the existing requirement under ESEA §1113 (c)(3)(A) to provide comparable services to homeless children who attend non-Title I schools
 - Clarifying the new authority to use Title I-A funds for supporting a Homeless Liaison’s salary and school of origin transportation for homeless students



2014 USED Guidance/Clarifications

Clarifying existing requirements:

Serving Homeless Children and Youth Under Title I, Part A

- Coordination is required between MV and Title I, Part A (Sections 1111(a)(1), 1112(a)(1), 1112(b)(1)(E)(ii) of ESEA).
- Homeless children and youth are eligible to be served in Title I, Part A schools (Sections 1114 and 1115(b)(2)(E) of ESEA).
 - Homeless children and youth are eligible for Title I, Part A services regardless of whether they attend a Title I school (Section 1113(c)(3)(A) of ESEA).
 - Section 1113(c)(3)(A) requires a local educational agency with non-Title I schools to reserve the necessary Title I funds to provide comparable Title I services to homeless children in non-Title I schools.



2014 USED Guidance/Clarifications

Clarifying existing requirements:

An LEA may also use Title I, Part A funds to provide:

- Educationally related services to homeless children and youth in shelters and other locations where they may live.
- Services that may not ordinarily be provided to other Title I students. For example:
 - Items of clothing, particularly if necessary to meet a school's dress or uniform requirement
 - Clothing and shoes necessary to participate in physical education classes
 - Additional examples in MDE 2014 Q & A *Guidance*
 - See USED Guidance from ARRA, 2009 for complete list



2014 USED Guidance/Clarifications

Clarifying new authority:

Serving Homeless Children and Youth Under Title I, Part A

- LEAs may use Title I-A funds to pay up to 100% of the salary of a Homeless Education Liaison
- LEAs may use Title I-A funds to provide transportation for homeless students to the school of origin
 - Under the MV Act, such transportation is a DISTRICT RESPONSIBILITY*
 - Allowable transportation costs for Title I-A are “*incremental*” costs (MV Guidance refers to these as “*excess*” costs)
 - Examples of allowable transportation costs for Title I-A funds –
 - Prepaid gas cards for parents/youth or others authorized to transport student to school
 - Taxi fare paid for student transportation UNTIL School or Origin & School of Residence can work out a bussing arrangement (“Stop-Gap” transportation)
 - Bus passes/tokens/tickets for high school youth to get to/from school

***Neither MV nor Title I may supplant by providing this service with grant funds.**



Impact of New Guidance on Our Work

Title I-A Homeless Reservation (Setaside)

- “To ensure that resources are available for this purpose, ESEA section 11113(c)(3)(A) requires an LEA to reserve from its Title I allocation ‘such funds as are necessary’ to provide to homeless children and youth who attend non-Title I schools ‘services comparable to those provided to children in schools’ funded under Title I.
- “Therefore, **an LEA must annually determine an appropriate reservation and uses for that reservation in order to provide comparable services.** An LEA can do so through a comprehensive needs assessment or other similar approach.”



MDE GUIDANCE

- As in previous years, the provision of LEA services to homeless students **must be coordinated with the designated homeless liaison**, with documentation of the collaboration kept on file.
- **If the same person is responsible** for oversight of the Title I Program and the Homeless Liaison duties, then collaboration must take place with additional stakeholders.
- **Definition of “comparable services” (USED/MDE)**
 - Services similar to those provided to Title I students attending Title I schools must be provided to homeless students attending non-Title I schools.



Materials Needed to Complete Template

- **MDE Q &A Guidance:** *Coordination Between Title I and McKinney-Vento (MV) – Services to Homeless Students, issued June 2014*
- **LEA Comprehensive Needs Assessment (CNA)**
- MV Homeless Consortium Needs Assessment
- Michigan Student Data System (MSDS) – LEA Verified Homeless Student Enrollment Count (previous SY)
- Community Resources – Available from MV Grant Coordinator
- MV Grant Services - Available from MV Grant Coordinator
- LEA policies for (any) financially distressed families
- Homeless Reservation Template Form



MDE GUIDANCE Reservation Template

TITLE I, PART A HOMELESS RESERVATION TEMPLATE UPDATED FOR SY 2014 - 2015

1. Name of LEA:  Date: _____

Name and Position of Title I Contact: _____

Name and Position of Homeless Education Liaison: _____

NOTE: Liaison position may not be funded with Title I, Part A Homeless Reserved funds. Up to 100% of the Liaison salary may be paid by Title I administrative funds, and will count toward the LEA's 10% administrative cap, under function code 226.

2. Certified MSDS number of homeless students enrolled in SY 2012-13: _____

LEA homeless count for SY 2013-14 from LEA Liaison (prior to MSDS certification): _____

NOTE: MDE-OFS may verify homeless student counts against the LEA MSDS pupil accounting data. Please indicate below which school year the LEA chooses to base its 2014-2015 Title I Homeless Reservation on:

_____ SY 2012-2013

_____ SY 2013-2014



3. LEA must read the assurances below and check the boxes to indicate compliance with the following requirements:

- ☐ This template was completed in collaboration with the designated homeless liaison and/or additional stakeholders (Documentation is on file).
- ☐ The LEA understands that:
 - Homeless students who attend a Title I Schoolwide Program school are to be included in the school's needs assessment and benefit from the education program designed to address those needs.
 - Homeless students who attend a Title I Targeted Assistance school are "categorically" eligible for Title I services, based on their status as homeless and not dependent on low academic achievement.



MDE GUIDANCE Reservation Template

TITLE I-A HOMELESS RESERVATION IS NOT REQUIRED (choose one):

- ☐ All schools in the LEA are Title I funded: The LEA will use Title I funds in all school buildings (Schoolwide and Targeted) to provide services for homeless students. Documentation of expenditures for homeless students will be kept on file.
- ☐ The LEA's MV Program outreach and identification practices have been reviewed by MDE and are in full compliance, and NO HOMELESS STUDENTS HAVE EVER BEEN IDENTIFIED. The LEA will continue to work with the MV Liaison and Grant Coordinator to document outreach and identification.



MDE GUIDANCE Reservation Template

TITLE I-A HOMELESS RESERVATION IS REQUIRED (choose one):

☐ Funding for ONLY Comparable Title I Services* for Homeless Students who attend non-Title I schools:

The LEA will use Title I-A reserved funds to provide only comparable Title I services* to homeless students in its non-Title I schools. McKinney Vento (MV) Grant Funds may NOT be used for this purpose. NOTE: Liaison salary and incremental/excess transportation costs may not come from the Homeless Reservation of Title I funds.

Total Reserved: \$___

☐ Funding for Comparable Title I Services* AND Additional Allowable Services* for Homeless Students:

The LEA will use Title I-A reserved funds to provide homeless students in non-Title I schools with comparable Title I services AND will use additional Title I-A funds to provide homeless students in all buildings with additional allowable services* that are not typically offered to ALL Title I students. McKinney Vento (MV) Grant Funds may NOT be used for this purpose. Consult with the MV Liaison to coordinate services. NOTE: Liaison salary and incremental/excess transportation costs may not come from the Homeless Reservation of Title I funds.

Total Reserved: \$___



MDE GUIDANCE Reservation Template

TITLE I-A HOMELESS RESERVATION IS NOT REQUIRED (choose one):

- ☐ All schools in the LEA are Title I funded: The LEA will use Title I funds in all school buildings (Schoolwide and Targeted) to provide services for homeless students. Documentation of expenditures for homeless students will be kept on file.
- ☐ The LEA's MV Program outreach and identification practices have been reviewed by MDE and are in full compliance, and NO HOMELESS STUDENTS HAVE EVER BEEN IDENTIFIED. The LEA will continue to work with the MV Liaison and Grant Coordinator to document outreach and identification.

TITLE I-A HOMELESS RESERVATION IS REQUIRED (choose one):

- ☐ **Funding for ONLY Comparable Title I Services* for Homeless Students who attend non-Title I schools:**

The LEA will use Title I-A reserved funds to provide only comparable Title I services* to homeless students in its non-Title I schools. McKinney Vento (MV) Grant Funds may NOT be used for this purpose.

Total Reserved: \$__

NOTE: Liaison salary and incremental/excess transportation costs may not come from the Homeless Reservation of Title I funds.

- ☐ **Funding for Comparable Title I Services* AND Additional Allowable Services* for Homeless Students:**

The LEA will use Title I-A reserved funds to provide homeless students in non-Title I schools with comparable Title I services AND will use additional Title I-A funds to provide homeless students in all buildings with additional allowable services* that are not typically offered to ALL Title I students. McKinney Vento (MV) Grant Funds may NOT be used for this purpose. Consult with the MV Liaison to coordinate services.

Total Reserved: \$__

NOTE: Liaison salary and incremental/excess transportation costs may not come from the Homeless Reservation of Title I funds.

**As defined by Office of Field Services' Q&A document entitled "Title I and Homeless", Q&A 4*

NOTE:

The homeless education liaison is responsible for coordinating or obtaining McKinney-Vento and Community resources for the homeless students and communicating their availability to the Title I contact. Additional Title I funds may be reserved for allowable uses, as long as there is no supplanting of other state, federal or LEA funds.



MDE GUIDANCE Reservation Template

Method for Determining Homeless Reservation - Select ONE method below.

LEAs are required to select one of the USED/MDE-approved methods for determining the amount of the Title I, Part A homeless reservation. The reservation must be determined in collaboration with the district homeless liaison or additional stakeholders if the Federal program coordinator and homeless liaison is the same person (*Coordination Between Title I and MV Services to Homeless Students, Q&A, Q4*). Other stakeholders include the Regional MV Grant Coordinator, Title I Director, the LEA Superintendent, a school counselor or social worker familiar with student needs, etc.

- ☐ **Method 1:** Identify count of homeless students in non-Title I buildings and determine a “reasonable and necessary” amount to provide comparable Title I services to homeless students in those schools, OR to provide comparable Title I services AND other allowable services to homeless students. (***Easiest method/Recommended method by MDE-OFS***)
- ☐ **Method 2:** Identify count of homeless students in non-Title I buildings and multiply by the district’s Title I, Part A per pupil allocation or by the average per pupil allocation.
- ☐ **Method 3:** Identify count of homeless students in non-Title I buildings and reserve a specific percentage based on the district’s poverty level or total Title I, Part A allocation.
- ☐ **Method 4:** Identify count of homeless students in ALL buildings and reserve an amount of Title I, Part A funds greater than or equal to the amount of a district’s portion of the McKinney-Vento Consortium sub-grant (IF funds are allocated to districts in your MV consortium). An LEA may NOT use McKinney Vento Funds for this purpose.



Impact of New Guidance on Our Work

- **EVERY DISTRICT RECEIVING TITLE I, PART A FUNDING MUST SUBMIT THE NEW 2014-15 HOMELESS RESERVATION TEMPLATE**
 - Whether or not the LEA is required to reserve funds
 - The **ONLY LEAs NOT REQUIRED TO RESERVE** are:
 - Districts that DO NOT RECEIVE Title I funding from the MDE
 - Districts in which ALL schools are Schoolwide Title I buildings
 - Single-building districts that are Schoolwide Title I
 - Whether or not the LEA reported any homeless students
 - **Monitors will review the LEA's outreach and identification procedures to ensure MV compliance**
 - Whether or not the identified homeless students are already below grade level (Automatically eligible)



Impact of New Guidance on Our Work

- MV Liaisons and LEA Title I Coordinators **MUST meet** throughout the school year to discuss and coordinate services to homeless students
 - **Documentation must be kept** on these meetings and any decisions made FOR MONITORING PURPOSES
- MV Liaisons and Title I Coordinators **MUST communicate** about the counts of homeless students in LEA schools (especially non-Title I schools)
- MV Liaisons should be part of the Consolidated Needs Assessment for their LEA
 - Questions pertinent to homeless students can be found in the NCHE's ***Needs Assessment & Program Evaluation Toolkit***
 - Ensure that the academic needs of homeless students are included in the **LEA's District Improvement Plan (DIP)**



MDE GUIDANCE

Other allowable uses of Title I-A funds for homeless students:

- Educationally related services to students in shelters and other locations where homeless children/youth live
- Services that may not ordinarily be provided to other Title I students –
 - Clothing, particularly if necessary to meet a school's dress code/uniform
 - Clothing or shoes for physical education participation
 - Student fees necessary to participate in the general education program
 - Personal school supplies (backpacks, notebooks, etc.)
 - Birth certificates or other documents necessary for school enrollment
 - Immunizations (and other health services not available from local agencies)
 - Food (outside of school, if not available from local resources)
 - Other examples listed in G-11 of ARRA Title I Use of Funds guidance



Impact of New Guidance on Our Work

- **Important to work with MV Grant Coordinators** to obtain local community/agency resources for homeless children/youth and their families
- Become familiar with district resources for low-income families and provide to homeless families
- Create awareness in your district and your community about homelessness
 - Request donations for a clothing closet/liaison store, etc. for personal hygiene and other items homeless students need
 - Tutors, mentors, volunteers, donors, advocates, etc.



MDE-OFS District Monitoring

- **Regional OFS Consultants On Site Review:**
 - LEA data on homeless students (esp. in non-Title I schools)
 - Coordination meeting log, minutes, etc.
 - Comparable services provided to homeless students
 - Use of Homeless Reservation (Setaside)
 - Homeless student needs in the CNA & DIP
- **Regional McKinney-Vento Consortium Review**
 - MV District Self Assessment (GEMS)
 - Section on Coordination of Services
 - Section on use of Title I Homeless Reservation



QUESTIONS



Contacts *(Please contact in this order)*

- **Your MV Regional Grant Coordinator**
- **MV Homeless Education Monitors**
 - Jon Behrens behrensj@michigan.gov
 - Ray Leighton leightonr@michigan.gov
 - Susan Whitener whiteners@michigan.gov
- **Michigan Department Of Education, Office of Field Services**
 - Special Populations Unit, MV Homeless Education Program
Pam Kies-Lowe, State Coordinator for Homeless Education
kies-lowe@michigan.gov
517-241-1162
 - Regional Support Unit, Regional Consultants (Title I-A & more)
517-373-4004

